

# EXHIBIT D



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May 22, 2024

**VIA EMAIL:** [omohammedi@otmlaw.com](mailto:omohammedi@otmlaw.com)

Omar T. Mohammedi, Esq.  
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233 Broadway, Suite 820  
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**Re: *Hazem Alseginy v. Mercer County Community College***

Dear Mr. Mohammedi:

This office serves as College Counsel to Mercer County Community College (“MCCC” or “the College”). This responds to your demand letter dated May 7, 2024. After careful consideration of its contents, I write to inform you that the College vociferously disagrees with your assessment that your client was subjected to targeted and discriminatory treatment and the reasons for his dismissal has been made clear during the internal appeal of the determination. To the contrary, your client’s dismissal from the program was due to his repeated violations of the aviation program policies. Please note that we are confident in our position and, should you choose to litigate, we intend to defend it vigorously.

We also disagree with the assertion that Mr. Alseginy is entitled to a full refund of his tuition. Please note that the College has already issued Mr. Alseginy a refund in the form of a credit to his account in the amount of \$8,963.45. This credit was posted on May 7, 2024, and reflects the unused portion of Mr. Alseginy’s flight fees from AVI240. It should also be noted that while your client did pay the required flight fees, he has also earned a private pilot license as well as hours, both of which will count should he choose to enroll in another aviation program elsewhere.

Thank you for your inquiry and please contact me directly with any related inquiries as direct communication with my client is prohibited under our Rules of Professional Conduct.

We trust that this correspondence clarifies our position.

Very truly yours,

*/s/ Perry L. Lattiboudere*

PERRY L. LATTIBOUDERE, ESQ.

PLL/ns